UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF INDIANA NEW ALBANY DIVISION

IN RE:			
VERNEY L. HELEN	}	CASE NO.	12-92288-BHL-13
AMANDA S. HELEN	}		
DEBTORS	}		

MOTION TO MODIFY DEBTORS' CHAPTER 13 PLAN AND NOTICE OF OBJECTION DEADLINE

Come now the above-captioned Debtors by Counsel, and files his Motion to Modify Debtors' Chapter 13 Plan. In support of this Motion, Counsel for the Debtors state as follows:

 The Debtors propose to allow an arrearage claim held by PNC Mortgage in the amount of \$859.68, said claim consists of escrow shortage.

WHEREFORE, the Debtors, by Counsel, requests the Court to modify their plan by increasing the Debtors' monthly plan payments from \$112.00 per month to \$134.99 per month commencing with the May, 2013 plan payment.

Dated this 25th day of April , 2013.

KOEHLER LAW OFFICE

Lloyd E. Koehler

Attorney No. 15669-98

William P. Harbison

Attorney No. 27139-53

400 Pearl St., Suite 200

New Albany, Indiana 47150 Telephone: (812)949-2211

Fax: (812)941-3907

E-mail: <u>lloydkoehler@hotmail.com</u>

VERNEY L. HELEN

AMANDA S. HELEN

NOTICE IS GIVEN THAT any Objection must be filed with the Bankruptcy Clerk within **21 days** from the date of service [or such other time period as may be permitted by Fed.R.Bankr.P.9006(f)]. Those not required or not permitted to file electronically must deliver any objection by U.S. mail, courier, overnight/express mail, or in person at:

U.S. Bankruptcy Court 110 U.S. Courthouse 121 W. Spring Street New Albany, Indiana 47150

The objecting party must ensure delivery of the objection to the party filing the motion, (the Trustee – if not the movant or the objector) (and the Debtor – if not the movant or the objector). If an objection is NOT timely filed, the requested relief may be granted.

CERTIFICATE OF SERVICE

The undersigned certifies that on the day of _______, 2013 a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Joseph M. Black, Jr., Chapter 13 Trustee: jmbecf@trustee13.com
U.S. Trustee: ustpregion10.in.ecf@usdoj.gov

I further certify that a true copy of the foregoing Motion to Modify was sent via U.S. Mail this day of _______, 2013 to all parties attached hereto:

WILLIAM P. HARBISON

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Label Matrix for local noticing 0756-4 Case 12-92288-BHL-13 Southern District of Indiana New Albany Thu Apr 25 13:40:49 EDT 2013 Burns Investments, LLC 2318 Carlton Terrace Louisville, KY 40205-2005 Joseph M. Black Jr PO Box 846 Seymour, IN 47274-0846

CAP1/FRNRW

PO BOX 5253

Burns Investments 2867 Charlestown Road New Albany, IN 47150-1984

WILMINGTON, DE 19850-5298

CHASE

P.O. BOX 15298

CONVERGENT 500 SW 7TH STREET BLDG A 100

RENTON, WA 98057-2983

Capital One, N.A.
Bass & Associates, P.C.
3936 E. Ft. Lowell Road, Suite #200
Tucson, AZ 85712-1083

CAROL STREAM, IL 60197-5253

Clark Circuit Court III 10C03-1207-SC-975 501 E. Court Ave. #137 Jeffersonville, IN 47130-4029

ENHANCRCVRCO 8014 BAYBERRY RD JACKSONVILLE, FL 32256-7412 GECRB/JCP PO BOX 965005 ORLANDO, FL 32896-5005 GLA COLLECT PO BOX 991199 LOUISVILLE, KY 40269-1199

HELVEY ASSOC 1015 E CENTER ST WARSAW, IN 46580-3420 Amanda S Helen 1576 Mona Vista Court New Albany, IN 47150-1807 Verney L Helen 1576 Mona Vista Court New Albany, IN 47150-1807

InSolve Recovery, LLC, c/o Capital Recovery
Dept 3203
PO BOX 123203
DALLAS, TX 75312-3203

Keith D. Mull, Atty 10C03-1207-SC-975 2867 Charlestown Road New Albany, IN 47150-1984 Koehler Law Office 400 Pearl St Suite 200 New Albany, IN 47150-3451

Lloyd E Koehler5 400 Pearl Street Ste 200 New Albany, IN 47150-3451 Keith D Mull Law Offices of Keith D. Mull, LLC 2867 Charlestown Rd. New Albany, IN 47150-1984 PARKCOMM FCU 6101 FERN VALLEY R LOUISVILLE, KY 40228-1045

PNC MORTGAGE 3232 NEWARK DR MIAMISBURG, OH 45342-5433 Park Community Federal Credit Union c/o Lloyd & McDaniel, PLC P. O. Box 23200 Louisville, KY 40223-0200 (p) PORTFOLIO RECOVERY ASSOCIATES LLC PO BOX 41067 NORFOLK VA 23541-1067

(p) SENEX SERVICES CORP 3333 FOUNDERS ROAD 2ND FLOOR INDIANAPOLIS IN 46268-4933 Andrew D Stosberg Lloyd & McDaniel, PLC 11405 Park Road, Suite 200 P.O. Box 23200 Louisville, KY 40223-0200 T-Mobile P.O. Box 742596 Cincinnati, OH 45274-2596

U.S. Trustee 101 W. Ohio St.. Ste. 1000 Indianapolis, IN 46204-1982

WFNNB/NY&C PO BOX 182789 COLUMBUS, OH 43218-2789 The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Portfolio Recovery Associates, LLC POB 12914 Norfolk VA 23541 SENEX SERVICES
PO BOX 90199
INDPLS, IN 46290

(d) SENEX SRVCS 3500 DEPAUW BLVD SUITE 3050 INDIANAPOLIS, IN 46268

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Park Community Federal Credit Union

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